

JUN 29 2018

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

David J. Bradley, Clerk

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Roel Ramirez Jr.

PRINCIPAL

Case Number:

YOB:

1981

M-18-1355 -M

United States

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 28, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that, William Gilberto Lara-Zacarias and Maynor Alberto Lara-Zacarias, citizens of Guatemala, along with four (4) other undocumented aliens for a total of six (6), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Abram, Texas to the point of arrest near Palmview, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On June 28, 2018, Border Patrol Agents received a camera image displaying several suspected undocumented aliens breaching the border wall near the Rio Grande River in Abram, Texas. This area is commonly used by alien smugglers to pick up illegal aliens and is approximately one mile away from the Rio Grande River.

SEE ATTACHMENT

Approved Joseph Leonard
Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

[Signature]
Signature of Complainant

Salvador Mendez Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

June 29, 2018

Date

3:48 *[Signature]*

at McAllen, Texas

City and State

Peter E. Ormsby

U. S. Magistrate Judge

Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18- 1355 -M

RE: Roel Ramirez Jr.

CONTINUATION:

A mobile agent responded and observed a subject running north away from the aforementioned border wall towards a residential area. Moments later, the agent observed a grey in color Ford Escape departing the same area. The agent proceeded to follow the Ford Escape and observed several silhouettes through the back window ducking as if they were trying to hide from view. The agent then activated his vehicle's emergency equipment and conducted a vehicle stop on the Ford Escape in Palmview, Texas. As the agent approached the Ford Escape, he was able to observe three individuals sweating and slouching in the back seat, two additional subjects laying down in the cargo area, and a male driver and a male front passenger. The driver was later identified as Roel Ramirez Jr., a United States Citizen. The six additional occupants were determined to be illegally present in the United States.

All subjects were placed under arrest and transported to the Border Patrol Station for processing.

PRINCIPAL STATEMENT

Roel Ramirez Jr., a was read his Miranda Rights however, he refused to provide a statement without an attorney present.

MATERIAL WITNESS 1

William Gilberto LARA-Zacarias, a citizen of Guatemala, was read his Miranda Rights and agreed to provide a statement.

LARA stated his sister made his smuggling arrangements with an unknown smuggler and was to pay \$5,000 (USD). LARA stated he crossed the river by raft with several other individuals and two foot guides. LARA claimed they climbed over a wall using a ladder and followed the foot-guides until arriving to an unknown residential area. Moments later, LARA stated the foot-guides instructed them to board a black truck that was already waiting for them. LARA claimed a male driver also instructed them to get in and shortly thereafter, the police stopped them.

MATERIAL WITNESS 2

Maynor Alberto LARA-Zacarias, a citizen of Guatemala, was read his Miranda Rights and agreed to provide a statement.

LARA-Zacarias stated his brother in law made his smuggling arrangements with an unknown smuggler and was to pay \$5,000 (USD). LARA-Zacarias stated he crossed the river by raft with his brother and several other individuals. LARA-Zacarias claimed they climbed over a wall using a ladder and were instructed by two foot guides to walk until arriving to an unknown residential area. Shortly thereafter, LARA-Zacarias stated they were instructed by the foot guides to board a four-door vehicle. Once inside the vehicle, LARA-Zacarias stated they departed the area and shortly thereafter, Border Patrol stopped them.